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March 14, 2024

VIA ECF

The Honorable P. Kevin Castel  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street., Courtroom 11D  
New York, New York 10007

**Re: *In re Google Digital Advertising Antitrust Litig.*, No. 1:21-md-03010 (PKC);  
*Inform Inc. v. Google LLC*, et al. No. 1:23-cv-01530 (PKC)**

Dear Judge Castel:

We are counsel to plaintiff Inform Inc. in connection with *Inform Inc. v. Google LLC*, No. 1:23-cv-01530 (PKC) (the “Inform Action”). No conference is currently scheduled before the Court.

On March 11, 2024, following this Court’s rulings on all pending motions to dismiss, Defendants requested a scheduling order from the Court requiring amendments to the operative complaints and a schedule for responding to the same. Therein, Defendants took the position that “Inform should be subject to the same order requested herein.” (ECF. No. 712, n. 1).

This morning, the Court endorsed Publisher Plaintiffs’ alternative proposal, ECF No. 713, ordering that Defendants “must Answer all claims and allegations that survived *a motion to dismiss* by March 29, 2024; and either answer the state-law claims by March 29, 2024, or file a pre-motion letter to dismiss such claims by March 15, 2024.” ECF. No. 714 (emphasis supplied). In seeking clarity as to the majority of MDL Plaintiffs’ complaints, Defendants filed a letter today, ECF No. 715, which letter does not list the Inform Action that was filed four and a half years ago.

Respectfully, we understood that the Court’s March 14, 2024 Order (ECF. No. 714) is likewise applicable to the Inform Action, and that Defendants are required to Answer all claims and allegations that survived their motion to dismiss by March 29, 2024; and either answer the state-law claims by March 29, 2024, or file a pre-motion letter to dismiss such claims by March 15, 2024.<sup>1</sup> To the extent the Court deems it necessary, we respectfully request that the Inform

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<sup>1</sup> “Unless the court sets a different time . . . (A) if the court denies the [Rule 12] motion . . . the responsive pleading must be served within 14 days after notice of the court’s action.” Fed. R. Civ. P. 12(a)(4)(A).

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Action be included in the clarification requested by Defendants. Additionally, as respects the Inform Action only, we do not object to Defendants' request that the Court extend Google's time to file its pre-motion letter regarding state-law claims to March 19, 2024.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Serina M. Vash

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